

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JACOB GUERRERO,

Defendant

) Criminal No. 22cr10142
)

) Violation:
)

) Count One: Sexual Exploitation of a Child
) (18 U.S.C. §§ 2251(a) and (e))
)

) Forfeiture Allegation:
) (18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Sexual Exploitation of a Child
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges:

On or about March 17, 2021, in the District of Massachusetts, the defendant,

JACOB GUERRERO,

employed, used, persuaded, induced, enticed, and coerced a minor, “Minor A,” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, and knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

CHILD EXPLOITATION FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 2251, set forth in Count One, the defendant,

JACOB GUERRERO,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

a. An iPhone with serial #FFMWQP0MJC6C.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or


e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON


MARK GRADY
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: June 23 2022

Returned into the District Court by the Grand Jurors and filed.

/s/ Thomas F. Quinn 6/23/22 @ 3:40pm
DEPUTY CLERK